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Attorney for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA,**
9 **SOUTHERN DIVISION**

10 LISA LIBERI, et al,

11 Plaintiffs,

12 CIVIL ACTION NUMBER:

13 vs.

14 8:11-cv-00485-AG (AJW)

15 ORLY TAITZ, et al,

16 Defendants.

17 **PLAINTIFF PHILIP J. BERG,
ESQUIRE'S ANSWERS TO THE
COURT'S THREE [3] QUESTIONS**

18 **COMES NOW** Plaintiff, Philip J. Berg, Esquire [hereinafter at times "Berg"
19 or "Plaintiff"]; and files the within responses to this Court's questions asked on
20 Friday, August 12, 2011. In Answer thereto, Plaintiff avers as follows:

- 21 1. The Court asked Plaintiff, "How many cases they have filed in the past
22 three years on behalf of themselves or affiliated entities with a list of case
23 names and numbers:

24 **Answer:** 4

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1 i. **Berg v. Obama, et al:**

2 U.S.D.C., Eastern District of PA, Case No. 08-cv-04083-RBS

3 ii. **Liberi, et al v. Taitz, et al:**

4 U.S.D.C., Eastern District of PA, Case No. 09-cv-01898-ECR

5 At the Defendants request, Judge Robreno severed the case into 2 separate
6 cases and transferred the case to:
7

8 **Liberi, et al v. Belcher, et al:**

9 U.S.D.C. Western District of Texas, Case No. 5:11-cv-00259-OLG

10 and transferred again to:

11 U.S.D.C., Northern District of Texas Case No. 2:11-cv-00090-J; and
12

13 **Liberi, et al v. Taitz, et al:** U.S.D.C., Central District of CA, Southern
14 Division, Case No. 8:11-cv-00485 AG

15 iii. **Berg, et al v. Obama, et al:** Qui Tam Action

16 U.S.D.C., District of Columbia, Case No. 1:08-cv-01933-RWR

17 iv. **Berg and Miller v. Weichert Realtors, et al:**

18 U.S.D.C., Eastern District of PA, Case No. 2:09-cv-00321 LDD

19 Case transferred to:

20 U.S.D.C., District of New Jersey, Case No. 1:10-cv-00353 NHL
21

22 **APPEALS:**

23 a. **Liberi, et al v. Taitz, et al:** U.S. Court of Appeals for the Third Circuit
24 Plaintiffs Appeal re Injunction
25 (Plaintiffs moved for dismissal: Granted)
26 Case No. 09-3403

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28 //

- 1 b. **Berg v. Obama, et al:** U.S. Court of Appeals for the Third Circuit
2 Case No. 08-4340
3 U.S. Supreme Court re Injunction, Case No. 08A391
4 U.S. Supreme Court re Injunction, Case No. 08A505
4 U.S. Supreme Court re Writ of Certiorari, Case No. 08-570
- 5 c. **Berg as Relator v. Obama:**
6 U.S. Court of Appeals for the District of Columbia
7 Case No. 09-5362
- 8 d. **Philip J. Berg, et al., v. U.S. Bank National Association, Trustee for**
9 **Lehman Brothers-Structured Assets Loan Trust Sail 2005-7:**
10 NJ Superior Court, Case No. A-4696-08T2
10 U.S. Supreme Court re Application for Stay, Case No. 08A1140
- 11 e. **In re Philip J. Berg:** U.S. Court of Appeals for the Third Circuit
12 Case No. 10-2243
- 13 f. **Berg v. Akropolis:** Superior Court of PA, Case No. 3104 EDA 2009
- 15 g. **Rambo v. Greene:** Superior Court of PA, Case No. 2467 EDA 2008

17 2. The Court asked Plaintiff “How many cases they have personally been a party to
18 in the past three years (including cases they filed), with a list of case names and
19 numbers:

21 **Answer:**

22 i. **Cases filed by Philip J. Berg, Esquire: Answer: 4**

24 a. **Berg v. Obama, et al:**

25 U.S.D.C., Eastern District of PA, Case No. 08-cv-04083-RBS

26 b. **Liberi, et al v. Taitz, et al:**

27 U.S.D.C., Eastern District of PA, Case No. 09-cv-01898-ECR

1 At the Defendants request, Judge Robreno severed the case into 2 separate
2 cases and transferred the case to:
3

4 **Liberi, et al v. Belcher, et al:**

5 U.S.D.C. Western District of Texas, Case No. 5:11-cv-00259-OLG
6 and transferred again to:
7

8 U.S.D.C., Northern District of Texas Case No. 2:11-cv-00090-J; and
9

10 **Liberi, et al v. Taitz, et al:** U.S.D.C., Central District of CA, Southern
11 Division, Case No. 8:11-cv-00485 AG

12 c. **Berg, et al v. Obama, et al:** Qui Tam Action

13 U.S.D.C., District of Columbia, Case No. 1:08-cv-01933-RWR

14 d. **Berg and Miller v. Weichert Realtors, et al:**

15 U.S.D.C., Eastern District of PA, Case No. 2:09-cv-00321 LDD

16 Case transferred to:

17 U.S.D.C., District of New Jersey, Case No. 1:10-cv-00353 NHL

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19 ii. **Cases filed against Philip J. Berg, Esquire: Answer: 1**

20 a. **In re Philip J. Berg**, Pennsylvania Supreme Court,
21 Case No. 208 DB 2010

23 iii. **Appeals filed by Philip J. Berg, Esq.**

25 a. **Liberi, et al v. Taitz, et al**, U.S. Court of Appeals for the Third Circuit
26 Plaintiffs Appeal re Injunction
27 (Plaintiffs moved for dismissal: Granted)
28 Case No. 09-3403

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- 1 b. Berg v. Obama, et al, U.S. Court of Appeals for the Third Circuit
2 Case No. 08-4340
3 U.S. Supreme Court re Injunction, Case No. 08A391
4 U.S. Supreme Court re Injunction, Case No. 08A505
5 U.S. Supreme Court re Writ of Certiorari, Case No. 08-570
- 6 c. Berg as Relator v. Obama,
7 U.S. Court of Appeals for the District of Columbia
8 Case No. 09-5362
- 9 d. Philip J. Berg, et al., v. U.S. Bank National Association, Trustee for
10 Lehman Brothers-Structured Assets Loan Trust Sail 2005-7
11 NJ Superior Court, Case No. A-4696-08T2
12 U.S. Supreme Court re Application for Stay, Case No. 08A1140
- 13 e. In re Philip J. Berg, U.S. Court of Appeals for the Third Circuit
14 Case No. 10-2243
- 15 f. Berg v. Akropolis, Superior Court of PA, Case No. 3104 EDA 2009
- 16 g. Rambo v. Greene, Superior Court of PA, Case No. 2467 EDA 2008

17 iv. **Appeals filed against Philip J. Berg, Esq.**

- 18 a. Liberi, et al v. Taitz, et al, U.S. Court of Appeals for the Third Circuit
19 Defendant Orly Taitz Appeal re Transfer Order (Order upheld)
20 Case No. 10-3000
- 21 b. Liberi, et al v. Taitz, et al, U.S. Court of Appeals for the Ninth Circuit
22 Defendant Defend our Freedoms Foundations, Inc. Appeal of this
23 Court's Anti-SLAPP ruling
24 Case No. 11-56079
- 25 c. Liberi, et al v. Taitz, et al, U.S. Court of Appeals for the Ninth Circuit
26 Defendant Orly Taitz/Orly Taitz, Inc. Appeal of this Court's Anti-
27 SLAPP Ruling
28 Case No. 11-56164

3. The Court asked Plaintiff “How many sanction orders have been issued against them – in either a pro se or representative capacity – in the past three years, in what amount or other form, and in which cases: **Answer:** 1

i. **Schecktor v. Louisville Ladder**, U.S.D.C., Middle District of PA, Case No. 09-00466

Philip J. Berg, Esquire was sanctioned \$1,000 as attorney fees payable to Defense Counsel by Judge John E. Jones, III for a discovery issue. Mr. Berg was unable to respond to the Motion filed, as the Court reduced time to answer, and Mr. Berg was in the Hospital in Colorado.

Respectfully submitted,

Dated: August 30, 2011

/s/ Philip J. Berg
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